

TIMOTHY F. HUNTER, ESQ.  
Nevada Bar No. 010622  
M. KEITH MOSKOWITZ, ESQ.  
*(Pro Hac Vice Pending)*  
JULIA M. BECKLEY, ESQ.  
*(Pro Hac Vice Pending)*  
RAY LEGO & ASSOCIATES  
7450 Arroyo Crossing Parkway, Suite 250  
Las Vegas, NV 89113  
Tel: (702) 479-4350  
Fax: (702) 270-4602  
[tshunter@travelers.com](mailto:tshunter@travelers.com)

Attorney for Defendant,  
**THE TRAVELERS  
INDEMNITY COMPANY**

**UNITED STATES DISTRICT COURT**

DISTRICT OF NEVADA

CARSON CITY, a consolidated municipality and political subdivision of the State of Nevada.

CASE NO.: 3:22-cv-00006 LRH-CLB

**Plaintiff,**

vs

THE TRAVELERS INDEMNITY COMPANY, a Connecticut Corporation, ROE COMPANIES I-X, and DOE INDIVIDUALS I-X,

Defendants.

**STIPULATED MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT**

The Parties, by and through undersigned counsel, hereby jointly request that the Court extend the deadline by which Defendant shall have to respond to the Complaint. Plaintiff and Defendant stipulate as follows:

1. Plaintiff filed the Complaint in the First Judicial District court for the State of Nevada in and for Carson City on November 17, 2021.

2. Defendant was served on December 9, 2021.

3. Defendant's deadline for answering or otherwise responding to the Complaint was December 30, 2021.

1       4. On December 23, 2021, given the holidays surrounding the response  
 2 deadline, Defendant requested that Plaintiff agree to a thirty day extension to respond to  
 3 the Complaint. On December 27, 2021, Plaintiff agreed that Defendant may have an  
 4 additional thirty (30) days to respond to the Complaint. Accordingly, the Parties agreed  
 5 that Defendant may have until January 28, 2022 to respond to the Complaint.

6       5. Defendant removed the case to this Court on January 7, 2022. ECF 1.

7       6. Despite the removal to federal court, the Parties wish to maintain their  
 8 previously agreed deadline for Defendant to respond to the Complaint as January 28,  
 9 2022.

10      7. Plaintiff consents to the relief requested in this Stipulation.

11     **NOW THEREFORE**, in consideration of the facts set forth above, the parties  
 12 hereby stipulate and agree as follows:

13      1. The deadline for Defendant to answer or otherwise respond to the  
 14 Complaint shall be January 28, 2022; and

15      2. Defendant does not waive any defenses to the Complaint or its right to  
 16 move to dismiss or otherwise move on the Complaint.

17     DATED: January 13, 2022

18     RAY LEGO & ASSOCIATES

19       
 20     \_\_\_\_\_  
 21     Timothy F. Hunter (SBN 10622)  
 22     Julia M. Beckley (*Pro Hac Vice Pending*)  
 23     M. Keith Moskowitz (*Pro Hac Vice Pending*)  
 24     *Attorneys for Defendant*  
 25     *Travelers Indemnity Company*

19     LEMONS, GRUNDY & EISENBERG

20       
 21     \_\_\_\_\_  
 22     Douglas R. Brown, Esq. (SBN 7620)  
 23     Dane A. Littlefield, Esq. (SBN 14080)  
 24     *Attorneys for Plaintiff*  
 25     *Carson City*

1 TIMOTHY F. HUNTER, ESQ.  
2 Nevada Bar No. 010622  
3 M. KEITH MOSKOWITZ, ESQ.  
4 (*Pro Hac Vice* Pending)  
5 JULIA M. BECKLEY, ESQ.  
6 (*Pro Hac Vice* Pending)  
RAY LEGO & ASSOCIATES  
7450 Arroyo Crossing Parkway, Suite 250  
Las Vegas, NV 89113  
Tel: (702) 479-4350  
Fax: (702) 270-4602  
[tfhunter@travelers.com](mailto:tfhunter@travelers.com)

**Attorney for Defendant,  
THE TRAVELERS  
INDEMNITY COMPANY**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CARSON CITY, a consolidated municipality and political subdivision of the State of Nevada,

**CASE NO.: 3:22-cv-00006 LRH-CLB**

Plaintiff,

VS

THE TRAVELERS INDEMNITY COMPANY, a Connecticut Corporation, ROE COMPANIES I-X, and DOE INDIVIDUALS I-X.

### Defendants.

**[PROPOSED] ORDER GRANTING STIPULATED MOTION TO EXTEND TIME TO  
RESPOND TO COMPLAINT**

Having consider the Stipulated Motion to Extend Time to Respond to Complaint (“Stipulated Motion”), and for good cause shown, the Stipulated Motion is hereby GRANTED.

111

111

111

11

1  
2       The deadline for Defendant to answer or otherwise respond to the Complaint shall  
3       be January 28, 2022. Defendant does not waive any defenses to the Complaint or its  
4       right to move to dismiss or otherwise move on the Complaint.

5       DATED this 13<sup>th</sup> of January, 2022.  
6

7                   IT IS SO ORDERED.  
8



9                   \_\_\_\_\_  
10                   UNITED STATES MAGISTRATE JUDGE  
11

12                   Ray Lego & Associates  
13                   7450 Arroyo Crossing Parkway Suite 250  
14                   Las Vegas, Nevada 89113  
15                   Telephone No. (702) 479-4350  
16                   Facsimile No. (702) 270-4602  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28